

Ex. E to Wells Decl.

From: [Buchwald, Lara Samet](#)
To: [Paschal, Hogan](#); [Martins, Tatiana R.](#); [Cooney, Mallory M.](#); [Moore, Desiree F.](#)
Cc: [Swanson, James R.](#); [Miller, Kerry](#); [Reichard, Benjamin D.](#); [Wells, Molly](#)
Subject: RE: O'Keefe v. Sequoia et al. - Waiver of Service
Date: Thursday, September 14, 2023 8:00:26 AM

Hogan,

Our clients—Deltec Bank & Trust Company Limited and Jean Chalopin—have been served with the complaint originally filed in the Southern District of Florida, O'Keefe v. Sequoia Capital Operations, LLC, et al., No. 1:23-cv-27000, via the relevant authorities in The Bahamas.

They have not been served with the duplicative complaint that plaintiffs filed in the Eastern District of Washington. We have not been authorized to accept service of that complaint.

With respect to the motion to dismiss deadlines, we already worked through a stipulated proposed order with your colleagues at the Moskowitz Law Firm and Boies Schiller. That stipulated proposed order was filed last week and an associated order has been entered.

Regards,

Lara

Lara Samet Buchwald

Davis Polk & Wardwell LLP
+1 212 450 4351 office
+1 973 865 3293 mobile
lara.buchwald@davispolk.com

From: Paschal, Hogan <hpaschal@fishmanhaygood.com>
Sent: Wednesday, September 13, 2023 10:23 AM
To: Buchwald, Lara Samet <lara.buchwald@davispolk.com>; Martins, Tatiana R. <tatiana.martins@davispolk.com>; Cooney, Mallory M. <Mallory.Cooney@klgates.com>; Moore, Desiree F. <Desiree.Moore@klgates.com>
Cc: Swanson, James R. <jswanson@fishmanhaygood.com>; Miller, Kerry <kmiller@fishmanhaygood.com>; Reichard, Benjamin D. <breichard@fishmanhaygood.com>; Wells, Molly <mwells@fishmanhaygood.com>
Subject: O'Keefe v. Sequoia et al. - Waiver of Service

Good morning,

I'm writing to request a waiver of service of the *O'Keefe* complaint against Deltec and Mr. Chalopin. We initiated service through the central authority for The Bahamas shortly after we filed the complaint in February but, as I'm sure you're aware, that process is lengthy, and I do not believe such service has yet been completed. In the interest of efficiency and uniform scheduling in the MDL, we thought we'd ask that your clients waive service, as the Court's Rule 12 deadlines are fast approaching.

Please let us know if your clients will agree to waive, and we will prepare the waivers. Otherwise, we will move the MDL court for an order granting service by alternative means. I will assume that if your clients do not waive service, they would oppose such motion.

Many thanks,
Hogan

Hogan Paschal
hpaschal@fishmanhaygood.com

FishmanHaygood LLP

201 St. Charles Avenue, 46th Floor
New Orleans, Louisiana 70170

t: 504.586.5252 d:504.556.5507 f: 504.310.0270

fishmanhaygood.com

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